



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2405

JUL 3 1991

Ref: 8HWM-FF

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Mr. Frazer Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Draft OU 5 RFI/RI Workplan

Dear Mr. Lockhart:

EPA completed the review of the Final Draft Phase I RFI/RI Work Plan, Rocky Flats Plant, Woman Creek Priority Drainage (Operable Unit No. 5), March 1991 (OU 5 workplan) and the revised Environmental Evaluation Plan (EE plan) (June, 1991) per the Interagency Agreement. The enclosed EPA review comments address several issues pertaining to administrative and technical problems with the proposed workplan. Additional EPA comments from other EPA divisions may be forthcoming. CDH comments on the OU 5 workplan and EE plan are also enclosed. EPA expects that EPA and CDH comments will be addressed to the satisfaction of the regulatory agencies.

Administratively, the plan bases the remedial investigation on a phased approach. This approach is not described in the text and thus it appears that iterative RFI/RI workplans will be necessary. EPA stresses that the IAG schedules are not flexible in this regard and EPA does not approve this approach. It is, however, acceptable to complete a specified task of a more comprehensive remedial study and amend the workplan according to findings from the study. The work associated with the amended plan must be completed in a timely manner to meet IAG schedules. It is important to focus the RFI/RI investigation on collecting information that can fully support the Corrective Action Decision/Remedial Action Decision (CAD/ROD).

The Environmental Evaluation (EE) Plan was revised and submitted separately from the OU 5 Workplan. EPA considers the EE plan as part of the OU 5 Workplan. The EE plan must follow the same review and approval schedule as the OU 5 Workplan and resubmittal of the final RFI/RI workplan must include the revised EE plan. EPA is aware of DOE's interest in beginning OU 5 EE field work at the earliest possible date as the study is tied into that of OU 1 which is on a faster track. The OU 5 EE workplan is adequate to commence field activities. However, the enclosed comments on the EE plan must be addressed in the final OU 5 workplan. DOE must propose to EPA and CDH an OU 5 EE field start date. Field activities must be carried out such that they

ADMIN RECORD

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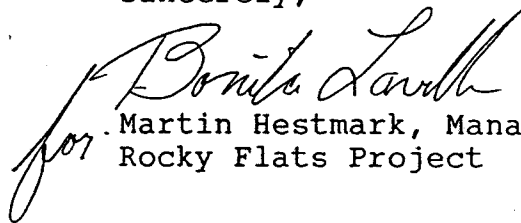
address the technical concerns stated in the enclosed comments.

Technically, the workplan does not layout a comprehensive approach to adequately characterizing each of the Individual Hazardous Substance Sites (IHSSs). Existing information on which the plan was based, was not adequately evaluated to identify data gaps and hence develop an adequate field sampling plan.

Recommendations regarding the investigative approach and site specific approach made by EPA and CDH during OU 5 RFI/RI scoping meetings were not addressed. This includes specific concerns regarding potential release of contaminants from the old landfill. The regulatory agencies felt strongly that these recommendations were instrumental in completing the RFI/RI investigation. Without evaluating more thoroughly the existing data and recommendations, the workplan will not be approved.

DOE is encouraged to contact EPA with any questions or concerns regarding the enclosed comments. The contact for OU 5 is Patricia Corbetta at (303) 294-1071.

Sincerely,


for Martin Hestmark, Manager
Rocky Flats Project

Encls.

cc: Patricia Corbetta, EPA
Peter Ornstein, EPA
Gary Baughman, CDH
Joe Schieffelin, CDH
Barbara Barry, RFP
Tom Olsen, DOE
Tom Ottensman, EG&G